

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Jeffrey Heldman, Esq. (013302012)  
VAZQUEZ HELDMAN  
18 Hook Mountain Road, Suite 201  
Pine Brook, New Jersey 07058  
(973) 434-7062

Attorneys for Defendants Premier Waterproofing LLC, Sam Shear, and Mike Winberg

LARAINÉ CONTE and JANET  
GUARINO,

Plaintiffs,

vs.

SAM SHEAR and MIKE WINBERG  
Individually and as Principals, Managers of  
def. PREMIER WATERPROOFING LLC,  
and JOHN DOE and ABC CO.,

Defendants.

Civil Action No.: 3:20-cv-16458

**MOTION TO COMPEL ARBITRATION**

**Returnable: November 1, 2021**

**TO:** George Dougherty, Esq.  
KATZ & DOUGHERTY LLC  
4020 Quakerbridge Road  
Mercerville, New Jersey 08619

PLEASE TAKE NOTICE that on November 1, 2021, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for defendants Premier Waterproofing LLC, Sam Shear, and Mike Winberg shall move before the Honorable Zahid N. Quraishi, U.S.D.J., United States District Court, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking to compel arbitration and stay this action.

PLEASE TAKE FURTHER NOTICE, that in support of the within motion, counsel for the defendants will rely upon this notice of motion, the certifications, the brief and the proposed order submitted herewith, as well as oral arguments of counsel (if necessary). If any responsive papers are filed in opposition to the Application, counsel for the defendants reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

VAZQUEZ HELDMAN

Attorneys for Defendants Premier Waterproofing  
LLC, Sam Shear, and Mike Winberg

BY: Jeffrey Heldman /s/  
JEFFREY HELDMAN, ESQ.

Date: September 29, 2021